

1 TREVOR J. HATFIELD, ESQ  
2 Nevada Bar No. 7373  
3 HATFIELD & ASSOCIATES, LTD.  
4 703 S. Eighth Street  
5 Las Vegas, Nevada 89101  
6 Telephone: (702) 388-4469  
7 Facsimile: (702) 386-9825  
8 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
9  
10 *Attorney for Plaintiffs*

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CASE NO: 2:19-cv-01474-APG-BNW

ELISEO NAPOLES, MARIE NAPOLES  
AND M.N., A MINOR, BY AND  
THROUGH HIS GUARDIAN AD LITEM,

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT,  
DOES I through X, inclusive; ROE  
CORPORATIONS I through X, inclusive

Defendant.

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(First Request)**

COMES NOW, Plaintiffs, ELISEO NAPOLES, MARIE NAPOLES AND M.N., A  
MINOR, BY AND THROUGH HIS GUARDIAN AD LITEM (hereinafter, "Plaintiffs"), by and  
through their counsel, the law firm of Hatfield & Associates, Ltd., and Defendant CLARK  
COUNTY SCHOOL DISTRICT (hereinafter "Defendant"), by and through its counsel, Phoebe  
V. Redmond, Esq., and Crystal J. Herrera, Esq., of the Clark County School District Office of  
the General Counsel, do hereby stipulate and agree to extend the discovery deadlines sixty (60)  
days pursuant to LR IA 6-1 and LR 26-4 for the reasons provided below. A Joint Stipulated  
Discovery Plan and Scheduling Order pursuant to FRCP 26(f) and LR 26.1-e was entered on  
January 30, 2020. (ECF No. 11). This is the first request for an extension of discovery  
deadlines.

1 Discovery closes on June 16, 2020. The last day to file Dispositive Motions is July 16,  
2 2020.

3 **1. DISCOVERY COMPLETED TO DATE:**

4 A. Plaintiffs served Initial Disclosures on Defendant on January 24, 2020.  
5 Defendant served Initial Disclosures on Plaintiffs on January 27, 2020.  
6

7 B. Plaintiffs have provided Defendant with Medical Record Release Authorizations.

8 **2. DISCOVERY YET TO BE COMPLETED:**

9 A. Plaintiffs intend to propound written discovery to Defendant, and take the  
10 depositions of fact and expert witnesses.

11 B. Defendant intends to propound written discovery to Plaintiffs, and take the  
12 depositions of fact and expert witnesses.  
13

14 **3. REASONS DISCOVERY COULD NOT BE COMPLETED WITHIN THE**  
15 **EXISTING DEADLINE.**

16 There has been a harsh turn of events in the nation since discovery commenced in this case.  
17 The COVID-19 pandemic has caused many businesses to close and individuals to self-quarantine.  
18 Currently, all non-essential businesses in the State of Nevada are closed for a minimum of thirty  
19 (30) days. This holding pattern is rendering it problematic for the parties to safely and effectively  
20 conduct discovery in this case. Indeed, in-person depositions cannot reasonably be scheduled or  
21 taken in the next 30 days and the parties have agreed to defer written discovery during this time.  
22 In order to allow for the parties to complete the remaining discovery provided above, the parties  
23 respectfully request that the discovery deadlines in this matter be extended sixty (60) days. This is  
24 the first request for an extension, which is made in good faith and not for the purposes of delay.  
25  
26

27 ///

28 ///

**4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY AND OTHER  
DISCOVERY DEADLINES.**

A. On January 30, 2019, this Court ordered that the last date to complete discovery would be June 16, 2020, that the last day to file dispositive motions would be July 16, 2020, and that the last day to file a pretrial order would be August 14, 2020. The parties stipulate and agree to a proposed sixty (60) day stay of discovery plus the following proposed rescheduled discovery dates:

**Summary of Proposed Changes**

	<b>Current Deadline</b>	<b>Revised Deadline</b>
<b>Close of Discovery</b>	<b>June 16, 2020</b>	<b>August 17, 2020</b>
<b>Interim Status Report</b>	<b>April 17, 2020</b>	<b>June 18, 2020</b>
<b>Disclosure of Experts and Expert Reports</b>	<b>April 17, 2020</b>	<b>June 18, 2020</b>
<b>Disclosure of Rebuttal Experts and their reports</b>	<b>May 18, 2020</b>	<b>July 17, 2020</b>
<b>Dispositive Motions</b>	<b>July 16, 2020</b>	<b>September 16, 2020</b>
<b>Pretrial Order</b>	<b>August 14, 2020</b>	<b>October 16, 2020</b>  (If dispositive motions are filed, 30 days after the entry of the court's ruling on said motion)

///

///

///

///

///

///

1  
2 Dated: March 27, 2020

3 HATFIELD & ASSOCIATES, LTD.

4 /s/ Trevor J. Hatfield

5 By: \_\_\_\_\_  
6 TREVOR J. HATFIELD  
7 Nevada Bar No. 7373  
8 703 South Eighth Street  
9 Las Vegas, Nevada 89101  
10 (702) 388-4469 Tel.  
11 (702) 386-9825 Fax  
12 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
13 Attorney for Plaintiff

Dated: March 27, 2020

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

/s/ Crystal J. Herrera

By: \_\_\_\_\_  
PHOEBE V. REDMOND, ESQ.  
Nevada Bar No. 9657  
CRYSTAL J. HERRERA, ESQ.  
Nevada Bar No. 12396  
5100 West Sahara Avenue  
Las Vegas, Nevada 89146  
Tel: (702) 799-5373  
Fax: (702) 799-5505  
Email: [redmopv@nv.ccsd.net](mailto:redmopv@nv.ccsd.net)  
Email: [herrec4@nv.ccsd.net](mailto:herrec4@nv.ccsd.net)  
Attorneys for Clark County School District

14  
15  
16  
17 **IT IS SO ORDERED.**

18 DATED this 30th day of March, 2020.

19  
20   
21 \_\_\_\_\_  
22 U.S. MAGISTRATE JUDGE  
23  
24  
25  
26  
27  
28